

EXHIBIT A



**Service of Process
Transmittal**

11/18/2019

CT Log Number 536648402

TO: Erica Nugent
BJ's Wholesale Club, Inc.
25 Research Dr
Westborough, MA 01581-3680

RE: Process Served in New Jersey

FOR: BJ's Wholesale Club, Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Joann Cloonan and Ray Cloonan, etc., Pltfs. vs. BJs Wholesale Club, Inc., et al., Dfts.

DOCUMENT(S) SERVED: Summons, Complaint, Attachment(s)

COURT/AGENCY: Bergen County Superior Court - Law Division, NJ
Case # BERL789519

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 05/23/2018

ON WHOM PROCESS WAS SERVED: The Corporation Trust Company, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 11/18/2019 at 12:54

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: Within 35 days from the date you received this summons, not counting the date you received it

ATTORNEY(S) / SENDER(S): Davis, Saperstein & Salomon P.C.
375 Cedar Lane
Teaneck, NJ 07666
201-907-5000

ACTION ITEMS: CT has retained the current log, Retain Date: 11/18/2019, Expected Purge Date: 11/23/2019

Image SOP

Email Notification, Service of Process legalnotices@bjs.com

Email Notification, KYMBEERLY IRIZARRY kirizarry@bjs.com

Email Notification, Cara Alessandrini calessandrini@bjs.com

Email Notification, CHRISTINA ELIASON celiason@bjs.com

SIGNED: The Corporation Trust Company

ADDRESS: 1209 N Orange St
Wilmington, DE 19801-1120

For Questions: 866-401-8252
EastTeam2@wolterskluwer.com

DAVIS, SAPERSTEIN & SALOMON P.C.
375 Cedar Lane
Teaneck, NJ 07666-3433
(201) 907-5000
Fax: (201) 692-0444
Attorneys for Plaintiff

JOANN CLOONAN AND RAY CLOONAN,
HER SPOUSE,

Plaintiff(s),

- vs -

BJ'S WHOLESALE CLUB, INC., UE
TONNELLE COMMONS LLC A/K/A NORTH
BERGEN EAT II LLC A/K/A URBAN EDGE
PROPERTIES, JOHN DOES 1-10
(FICTITIOUS NAMES REPRESENTING
UNKNOWN INDIVIDUALS) AND/OR XYZ
CORPS. 1-10 (FICTITIOUS NAMES
REPRESENTING UNKNOWN
CORPORATIONS, PARTNERSHIPS AND/OR
LIMITED LIABILITY COMPANIES OR
OTHER TYPES OF LEGAL ENTITIES)

Defendant(s).

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN

DOCKET NO. BER-L-7895-19

Civil Action

SUMMONS

**FROM THE STATE OF NEW JERSEY
TO THE DEFENDANT (S) NAMED ABOVE:**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the

date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/s/ Michelle M. Smith

MICHELLE M. SMITH, Clerk

Dated: November 15, 2019

Name of Defendant to be served: BJ'S WHOLESALE CLUB, INC.
c/o The Corporation Trust Company
820 Bear Tavern Road
West Trenton, NJ 08628

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 221-0700
COURT HOURS 8:30 AM - 4:30 PM

DATE: NOVEMBER 13, 2019
RE: CLOONAN JOANN VS BJS WHOLESALE CLUB, INC.
DOCKET: BER L -007895 19

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON LISA PEREZ-FRISCIA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: PAUL A. GARFIELD
DAVIS SAPERSTEIN & SALOMON PC
375 CEDAR LN
TEANECK NJ 07666

ECOURTS

Paul A. Garfield, Esq. - 015691989
DAVIS, SAPERSTEIN & SALOMON, P.C.
375 Cedar Lane
Teaneck, New Jersey 07666-3433
(201) 907-5000
Fax: (201) 692-0444
Attorneys for Plaintiff(s)

Joann Cloonan and Ray Cloonan, her spouse

Plaintiff(s),

- vs -

BJ's Wholesale Club, Inc., UE Tonnelle
Commons LLC a/k/a North Bergen Eat II LLC
a/k/a Urban Edge Properties, John Does 1-10
(fictitious names representing unknown
individuals) and/or XYZ Corps. 1-10 (fictitious
names representing unknown corporations,
partnerships and/or Limited Liability Companies
or other types of legal entities)

Defendant(s).

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

DOCKET NO: BER-L-

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiffs Joann Cloonan and Ray Cloonan residing in the County of Bergen, 205 Fourth
Street, Fairview, New Jersey, 07022, by way of Complaint against the Defendants say:

FIRST COUNT

1. On or about May 23, 2018, the Plaintiff Joann Cloonan was a business invitee, lawfully upon the premises, owned, operated, leased, controlled, supervised, managed, maintained and/or repaired and/or inspected by the Defendants BJ's Wholesale Club, Inc., UE Tonnelle Commons LLC a/k/a North Bergen Eat II LLC a/k/a Urban Edge Properties (hereinafter referred to as "North Bergen Eat II LLC"), John Does 1-10 and/or XYZ Corps. 1-10, located at or near 2100 88th Street, in the Township of North Bergen, County of Hudson, and the State of New Jersey.

2. Upon information and belief, at all relevant times herein mentioned, the Defendant BJ's Wholesale Club, Inc. was a foreign profit corporation authorized to do business in the State of New Jersey, with its main business address located at 25 Research Drive, Westborough, Massachusetts, 01581.

3. Upon information and belief, at all relevant times herein mentioned, the Defendant North Bergen Eat II LLC was a foreign limited liability company authorized to do business in the State of New Jersey, with its main business address located in the County of Bergen, 210 Route 4 East, Paramus, New Jersey, 07652.

4. At the aforesaid time and place, due to the careless, reckless, and negligent, ownership, operation, lease, control, supervision, management and/or maintenance and/or repair and/or inspection of the premises by the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was caused to trip and fall, thereby causing the Plaintiff to sustain severe personal injuries.

5. As a direct and proximate result of the aforesaid carelessness, recklessness, and negligence of the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Joann Cloonan demands judgment against the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10, individually, jointly or severally, for damages together with interest and costs of suit.

SECOND COUNT

1. Plaintiff Joann Cloonan repeats each and every allegation of the First Count of the Complaint as if set forth at length herein verbatim.

2. At the aforesaid time and place, the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10 were independent contractors responsible for the upkeep and/or maintenance and/or inspection for the aforementioned premises.

3. As a direct and proximate result of the careless, reckless, and negligent upkeep and/or maintenance and/or inspection of the premises by the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was caused to trip and fall, thereby causing the Plaintiff to sustain severe personal injuries.

4. As a direct and proximate result of the aforesaid carelessness, recklessness, and negligence of the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Joann Cloonan demands judgment against the Defendants BJ's Wholesale Club, Inc., North Bergen Eat II LLC, John Does 1-10 and/or XYZ Corps. 1-10 individually, jointly or severally, for damages together with interest and costs of suit.

THIRD COUNT

1. Plaintiff Joann Cloonan repeats each and every allegation of the First and Second Counts of the Complaint as if set forth at length herein verbatim.

2. At the aforesaid time and place, the Defendant John Does 1-10 was an unknown person or persons whose actions caused and/or contributed, directly or indirectly, to the incident herein and the injuries and damages suffered by the Plaintiff Joann Cloonan.

3. At the aforesaid time and place, the Defendant XYZ Corps. 1-10 was an unknown business, corporation and/or entity, whose agents, servant and/or employee's actions caused and/or contributed, directly or indirectly, to the incident herein and the injuries and damages suffered by the Plaintiff Joann Cloonan.

4. As a direct and proximate result of the aforesaid carelessness, recklessness, and negligence of the Defendants John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was caused to sustain severe personal injuries.

5. As a direct and proximate result of the aforesaid carelessness, recklessness, and negligence of the Defendants John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Joann Cloonan was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend to her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Joann Cloonan demands judgment against the Defendants John Does 1-10 and/or XYZ Corps. 1-10 individually, jointly or severally, for damages together with interest and costs of suit.

FOURTH COUNT

1. Plaintiff Ray Cloonan repeats each and every allegation of the First through Third Counts of the Complaint as if set forth at length herein verbatim.

2. Plaintiff Ray Cloonan is the spouse of Joann Cloonan, the injured Plaintiff.

3. As a direct and proximate result of the aforesaid injuries to the Plaintiff Joann Cloonan, the Plaintiff Ray Cloonan has been and will be deprived of the consortium and services of the said injured Plaintiff.

WHEREFORE, the Plaintiff Ray Cloonan demands judgment against the Defendants for such sum as would be reasonable and proper compensation in accordance with the laws of the State of New Jersey, together with interest and costs.

DAVIS, SAPERSTEIN & SALOMON, P.C.
Attorneys for Plaintiffs

Dated: November 12, 2019

BY:  PAUL A. GARFIELD, ESQ.
For the Firm

-5-

DAVIS, SAPERSTEIN & SALOMON, P.C.
375 Cedar Lane
Teaneck, New Jersey 07666-3433
(201) 907-5000

JURY DEMAND

Plaintiffs demand a trial by jury on all issues raised in the various Counts of the Complaint.

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Christopher T. Karounos, Esq. as trial counsel in this matter.

DAVIS, SAPERSTEIN & SALOMON, P.C.
Attorneys for Plaintiffs

Dated: November 12, 2019

BY: PAUL A. GARFIELD, ESQ.
For the Firm

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(b)(1), et seq., Plaintiffs hereby demand that Defendants answer Form "C" Uniform Set of Interrogatories of Appendix II and supplemental Form "C2", within the time prescribed by the Rules of Court. Plaintiffs reserve the right to propound additional supplemental Interrogatories pursuant to the Rules of Court.

CERTIFICATION

I certify, pursuant to R.4:5-1, that to the best of my knowledge, information and belief at this time, the matter in controversy is not the subject matter of any other action pending in any other court, nor of any pending arbitration proceeding; that no other action or arbitration is contemplated; and that there are no other parties who should be joined in this action.

DAVIS, SAPERSTEIN & SALOMON, P.C.
Attorneys for Plaintiffs

Dated: November 12, 2019

BY: PAUL A. GARFIELD, ESQ.
For the Firm

Civil Case Information Statement

Case Details: BERGEN Civil Part Docket# L-007895-19

Case Caption: CLOONAN JOANN VS BJS WHOLESALE CLUB, INC.

Case Initiation Date: 11/13/2019

Attorney Name: PAUL ALAN GARFIELD

Firm Name: DAVIS SAPERSTEIN & SALOMON PC

Address: 375 CEDAR LN

TEANECK NJ 07666

Phone: 2019075000

Name of Party: PLAINTIFF : Cloonan, Joann

Name of Defendant's Primary Insurance Company
(if known): SEDGWICK CLAIMS MANAGEMENT

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, Is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO

Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

11/13/2019
Dated

/s/ PAUL ALAN GARFIELD
Signed

NJ SUPERIOR COURT LAWYER REFERRAL AND LEGAL SERVICE LIST

ATLANTIC COUNTY:

Deputy Clerk, Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

ESSEX COUNTY:

Deputy Clerk, Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr.
Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

MONMOUTH COUNTY:

Deputy Clerk, Superior Court
Court House
P. O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk, Superior Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

BERGEN COUNTY:

Deputy Clerk, Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

GLOUCESTER COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office,
Attr: Intake, First Fl., Court
House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington & Court Streets
P. O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 287-5382
LEGAL SERVICES
(973) 285-6911

UNION COUNTY:

Deputy Clerk, Superior Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-
6073
LAWYER REFERRAL
(808) 353-4715
LEGAL SERVICES
(808) 354-4340

BURLINGTON COUNTY:

Deputy Clerk, Superior Court
Central Processing Office
Attr: Judicial Intake
First Fl., Courts Facility
49 Francocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

HUDSON COUNTY:

Deputy Clerk, Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 788-2727
LEGAL SERVICES
(201) 782-6363

OCEAN COUNTY:

Deputy Clerk, Superior Court
Court House, Room 121
118 Washington Street
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 248-3666
LEGAL SERVICES
(732) 341-2727

WARREN COUNTY:

Deputy Clerk, Superior Court
Civil Division, Court
House
413 Second Street
Belvidere, NJ 07823-
1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

CAMDEN COUNTY:

Deputy Clerk, Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150 -
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 984-2010

HUNTERDON COUNTY:

Deputy Clerk, Superior Court
Civil Division
65 Park Avenue
Flomington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

PASSAIC COUNTY:

Deputy Clerk, Superior Court
Civil Division - Court House
77 Hamilton Street
Paterson, NJ 07605
LAWYER REFERRAL
(973) 278-8223
LEGAL SERVICES
(973) 623-2900

CAPE MAY COUNTY:

Deputy Clerk, Superior Court
9 N. Main Street
Cape May Court House, NJ
08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Deputy Clerk, Superior Court
Local Filing Office, Courthouse
175 S. Broad Street
P. O. Box 8968
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

Deputy Clerk, Superior Court
Attr: Civil Case Management
Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 835-6629
LEGAL SERVICES
(856) 691-0484

CUMBERLAND COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office
60 West Broad Street
P. O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

MIDDLESEX COUNTY:

Deputy Clerk, Superior Court
Middlesex Vicinage
Second Floor, Tower
56 Paterson Street
P. O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

SOMERSET COUNTY:

Deputy Clerk, Superior Court
Civil Division Office
40 North Bridge Street
P. O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840